

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

NEW YORKERS AGAINST  
CONGESTION PRICING TAX, *et al.*,

*Plaintiffs,*  
v.

UNITED STATES DEPARTMENT OF  
TRANSPORTATION, *et al.*,

*Defendants.*

Case No. 1:24-cv-00367-LJL

**NOTICE OF PARTIAL MOTION  
TO DISMISS THE AMENDED  
COMPLAINT BY THE  
METROPOLITAN  
TRANSPORTATION AUTHORITY,  
THE NEW YORK CITY  
DEPARTMENT OF  
TRANSPORTATION, THE  
TRAFFIC MOBILITY REVIEW  
BOARD, AND THE TRIBOROUGH  
BRIDGE AND TUNNEL  
AUTHORITY**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants the Metropolitan Transportation Authority, the New York City Department of Transportation, the Traffic Mobility Review Board, and the Triborough Bridge and Tunnel Authority's Partial Motion to Dismiss the Amended Complaint, the Declaration of Roberta A. Kaplan and exhibit thereto, and all other papers and proceedings herein, Defendants, by and through their counsel, will move this Court before the Honorable Lewis J. Liman, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an order pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure partially dismissing the Amended Complaint with prejudice.

Dated: March 18, 2024

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Respectfully submitted,

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